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Attorneys for Defendants

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – SOUTHERN DIVISION

MUSKEGON HOLDINGS LLC, a
Delaware limited liability company,

Plaintiff/Counter-Defendant,

v.

VP LB13 LLC, a California limited liability
company; and CANOPY COMMUNITIES
CORPORATION, f/k/a DECRO GAMMA
CORPORATION, a California nonprofit
corporation,

Defendants/Counterclaimants/
Third-Party Plaintiffs,

v.

ALDEN TORCH FINANCIAL LLC, a
Delaware limited liability company, and
DECRO LONG BEACH, L.P., a California
limited Partnership,

Third-Party Defendants.

Case No. 8:23-cv-01302-DOC
(JDEx)

*Hon. David O. Carter, Courtroom
10A*

**DECLARATION OF VIVIAN I.
ORLANDO IN SUPPORT OF
DEFENDANTS' MOTION FOR
ATTORNEYS' FEES AND NON-
TAXABLE COSTS**

[Filed concurrently with Notice of
Motion and Motion for Attorneys'
Fees and Non-Taxable Costs with
Incorporated Memorandum of Points
and Authorities; Declaration of David
Nahas; Declaration of Carolina
Romo; Declaration of Candace
Leasure; Declaration of David A.
Davenport; and Proposed Order]

Date: March 10, 2025
Time: 8:30 a.m.
Ctrm: 10A
Judge: Hon. David O. Carter

DECLARATION OF VIVIAN I. ORLANDO IN SUPPORT OF DEFENDANTS'
MOTION FOR ATTORNEYS' FEES AND NON-TAXABLE COSTS

1 I, Vivian I. Orlando, declare as follows:

2 1. I am over 18 years of age.

3 2. I submit this Declaration in Support of Defendants' Motion for
4 Attorneys' Fees and Non-Taxable Costs (the "Motion") based upon my personal
5 knowledge.

6 3. I am an attorney with Maynard Nexsen LLP and am admitted to
7 practice law in the State of California. I am counsel of record for Defendants and
8 have served in a local counsel capacity.

9 4. I was the sole timekeeper on this matter at Maynard Nexsen LLP.
10 My billing rate was \$400.00 per hour.

11 5. In my capacity as local counsel, I have billed a total of 5.2 hours to
12 date, totaling **\$2,080.00** in attorneys' fees. These fees were incurred in providing
13 various local counsel services, including drafting and advising on local
14 requirements relating to the issuance of a summons, initial disclosures, *ex parte*
15 applications, filing exhibits under seal, and pretrial filings.

16 6. Additionally, Maynard Nexsen LLP incurred a total of **\$4,326.50** in
17 costs on behalf of the Defendants, itemized as follows:

18 a. **\$1,500.00** in *pro hac vice* filing fees;

19 b. **\$1,553.00** paid to Apex Legal Services for printing, assembling
20 and delivering to Chambers courtesy copies of under-seal
21 pleadings and exhibits filed in support of Defendants' Motion for
22 Partial Summary Judgment and in opposition to Plaintiff's Motion
23 for Summary Judgment; and

24 c. **\$1,273.50** paid to Apex Legal Services for printing, assembling
25 and delivering to Chambers courtesy copies of under-seal pretrial
26 pleadings and exhibits.

7. Based on my experience as an attorney, it is my opinion that the above-identified fees and costs were reasonable and necessary to the successful litigation of this matter.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct.

Executed this 29th day of January 2025, in Los Angeles, California.

/s/ Vivian I. Orlando

Vivian I. Orlando